

(Del. Rev. 11/14) Pro Se General Complaint Form

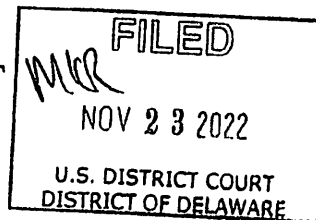
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARERobert Charles Lewis

(In the space above enter the full name(s) of the plaintiff(s).)

-against-

Exxon Mobil Corporation

(In the space above enter the full name(s) of the defendant(s).
If you cannot fit the names of all of the defendants in the
space provided, please write "see attached" in the space
above and attach an additional sheet of paper with the full list
of names. The names listed in the above caption must be
identical to those contained in Section I. Do not include
addresses here.)

Civ. Action No. 22 - 15354
(To be assigned by Clerk's
Office)COMPLAINT
(Pro Se)

Jury Demand?

☒ Yes☐ No

NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

If this is an employment discrimination claim or social security claim, please use a different form.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

(Del. Rev. 11/14) Pro Se General Complaint Form

I. PARTIES IN THIS COMPLAINT**Plaintiff**

List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff:

Lewis, Robert, C.

Name (Last, First, MI)

100 Stroud Street

Street Address

New Castle County, Wilmington, DE 19805

County, City

State

Zip Code

302-498-3703

Telephone Number

chuckandcatherine1@gmail.com

E-mail Address (if available)

Defendant(s)

List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant 1:

Exxon/Mobil Corporation

Name (Last, First)

5959 Las Colinas Boulevard

Street Address

Irving, Texas 75039-2298

County, City

State

Zip Code

PHONE # (972) 940-6000

Defendant 2:

Name (Last, First)

Street Address

County, City

State

Zip Code

(Del. Rev. 11/14) Pro Se General Complaint Form

Defendant(s) Continued

Defendant 3:

Name (Last, First)

Street Address

County, City

State

Zip Code

Defendant 4:

Name (Last, First)

Street Address

County, City

State

Zip Code

II. BASIS FOR JURISDICTION

Check the option that best describes the basis for jurisdiction in your case:

- ☐ **U.S. Government Defendant:** United States or a federal official or agency is a defendant.
- ☒ **Diversity of Citizenship:** A matter between individual or corporate citizens of different states and the amount in controversy exceeds \$75,000.
- ☐ **Federal Question:** Claim arises under the Constitution, laws or treaties of the United States.

If you chose "Federal Question", state which of your federal constitutional or federal statutory rights have been violated.

(Del. Rev. 11/14) Pro Se General Complaint Form

III. VENUE

This court can hear cases arising out of the Counties of New Castle, Kent, and Sussex in the State of Delaware.

Under 28 U.S.C § 1391, this is the right court to file your lawsuit if: (1) All defendants live in this state AND at least one of the defendants lives in this district; OR (2) A substantial part of the events you are suing about happened in this district; OR (3) A substantial part of the property that you are suing about is located in this district; OR (4) You are suing the U.S. government or a federal agency or official in their official capacities and you live in this district. Explain why this district court is the proper location to file your lawsuit.

Venue is appropriate in this Court because:

I at the time lived in Holly Oak, Delaware 1980-9 and I worked in New Castle County, Delaware at the EXXON/MOBIL gas station located on Interstate I-95 in Newark, DE.

IV. STATEMENT OF CLAIM

Place(s) of occurrence:

EXXON/MOBIL gas station cashier's booth, Newark, DELAWARE, NEW CASTLE COUNTY,

Date(s) of occurrence:

October 7th, 8th, & Oct. 9th 2000

State here briefly the FACTS that support your case. Describe how each defendant was personally involved in the alleged wrongful actions.

FACTS:

What happened to you?

*① Exxon Mobil Corporation advertised that a cashier was needed at their station located on Interstate 95 in Newark, Delaware, U.S.A.
② I applied and was hired.
③ I made the Manager aware of all the prescription medications I was taking*

(Del. Rev. 11/14) Pro Se General Complaint Form

prior to his hiring me. I listed them all on the job application. I also informed him in writing as well as verbally that I had Type 2 diabetes and that I was considered to be mentally ill with a diagnosis of "Schizoaffective Disorder."

④ The manager, whose name is MANNY DOMINQUEZ, after hiring me, put me in an enclosed booth that, unknown to me, had gasoline fumes entering it, especially after heavy rains.

⑤ Eventually, I was over-whelmed by the gasoline fumes and had to go to Christiana Hospital.

⑥ I was diagnosed with gasoline in my bloodstream.

Was anyone
else
involved?

⑦ I was told by the Doctor that I could die without warning at any time due to the gasoline in my blood!!!!!!

→ YES.

There was another employee in the cashier booth that was working, who, after inhaling the gasoline fumes, died 2 or 3 days later.

(Del. Rev. 11/14) Pro Se General Complaint Form

Who did
what?

As the fumes in the booth affected me more and more, I called Christiana Fire Company for an investigation according to company policy posted in the booth. The fire company responded quickly and ended up removing a wood panel inside the cashier's booth. I was in and upon the removal of the panel the gasoline fumes were so strong that they almost overcame the fireman and he ordered myself and the other male employee to immediately go outside. The fire company called the EPA who closed the entire area.

(Del. Rev. 11/14) Pro Se General Complaint Form

V. INJURIES

If you sustained injuries related to the events alleged above, describe them here.

My injury is the fact that still to this day my physical body is still somehow polluted with the chemicals that were in the gasoline roughly 22 years ago. Robert Charles Lewis.

VI. RELIEF

The relief I want the court to order is:

☒ Money damages in the amount of: \$ 5,000,000.00 (Five million dollars).

☒ Other (explain):

Punitive damages.

Because EXXONMOBIL CORPORATION was so callously unconcerned for my personal welfare and caused me physical harm, emotional harm, and psychological harm to the point of me being committed to the ROCKFORD CENTER. I 100% believe that they should be made to pay me the equivalent of 1 year's worth of their NET EARNINGS.

(Del. Rev. 11/14) Pro Se General Complaint Form

VII. CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; and (3) complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

November 19th, 2022Dated 6:35AM,Robert Charles Lewis.

Plaintiff's Signature

LEWIS, ROBERT C.

Printed Name (Last, First, MI)

100 Stroud St., Wilmington, DE 19805-4842

Address

City

State

Zip Code

(302) 498-3703

Telephone Number

chuckandcatherine1@gmail.com

E-mail Address (if available)

(302) 502-5841

List the same information for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

Mr. Robert Lewis
100 Stroud St.
Wilmington, DE 19805

FIRST CLASS



US POSTAGE W. PITNEY BOWES
ZIP 19801 \$ 001.68⁰
02 7H
0001326635 NOV 21 2022

FILED

NOV 23 2022

U.S. DISTRICT COURT
DISTRICT OF DELAWARE

TO: Office Of The Clerk
United States District Court
844 N King Street, Unit 18
Wilmington, Delaware 19801-3570

